

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

ALVIN L. HINTZ, JR.,	)	
	)	
Plaintiff,	)	
	)	
	)	No. 08-C-1444
	)	
THE PRUDENTIAL INSURANCE	)	Judge Dow, Jr.
COMPANY OF AMERICA	)	
	)	
Defendant.	)	Magistrate Judge Valdez

**PLAINTIFF'S MOTION TO EXTEND DISCOVERY DEADLINE**

Plaintiff Alvin Hintz ("Plaintiff") by and through his undersigned attorney, hereby moves the Court to extend the Discovery Deadline in this matter to August 1, 2008. In support of this motion, Plaintiff states as follows:

1. On May 1, 2008, the parties filed a Joint Proposed Case Management Plan, which included, *inter alia*, a Discovery Plan.
2. According to the Proposed Discovery Plan, discovery in this matter was to be completed on or before July 18, 2008.
3. On June 24, 2008, Plaintiff served Discovery Requests to Defendant via first class mail, including Interrogatories and Requests for Production.
4. On July 7, 2008, Defendant moved to substitute the appearance of Rebecca M. Rothmann and Edna S. Bailey of the law firm of Wilson, Elser, Moskowitz, Edelman & Dicker, LLP, for that of Thomas F. Hurka, Charles Clark Jackson, Lucy D. Schwallie and John R. Richards of the law firm of Morgan, Lewis & Bockius, LLP, withdrawn.

5. On July 17, 2008, the Court granted Defendant's motion for substitution of Counsel.

6. In order to give Defendant's new counsel the opportunity to adequately respond to Plaintiff's Discovery Requests, Plaintiff requests that the deadline for discovery be extended to August 1, 2008.

7. Plaintiff suggests that both parties appear on this motion to confer and determine whether any additional dates or the briefing schedule contained in the Discovery Plan may also need revision.

WHEREFORE, Plaintiff respectfully requests the Court grant his Motion to Extend Discovery Deadline.

Respectfully Submitted:

ALVIN L. HINTZ JR., Plaintiff, by

s/ Marcie E. Goldbloom  
Marcie E. Goldbloom  
Attorney for Plaintiff  
Daley, DeBofsky and Bryant  
55 W Monroe St Ste 2440  
Chicago, Illinois 60603  
(312) 372-5200 / FAX (312) 372-2778

**CERTIFICATE OF SERVICE**

TO: Rebecca M. Rothmann  
Edna S. Bailey  
Wilson, Elser, Moskowitz, Edelman & Dicker LLP  
120 North La Salle Street, Suite 2600  
Chicago, Illinois 60602  
(312) 704-0550  
(312) 704-1522

The undersigned attorney hereby certifies that on July 18, 2008, she electronically filed the foregoing PLAINTIFF'S MOTION TO EXTEND DISCOVERY DEADLINE with the Clerk of the Court using the CMF/ECF filing system, which sent notice of such filing to: Rebecca Rothmann and Edna Bailey, and that I hereby certify that I have mailed via the United States Postal Service the document to the following non-CMF/ECF participants: N/A

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s/ Marcie E. Goldbloom  
Marcie E. Goldbloom  
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